

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A	§	
BRAZOS LICENSING AND	§	CIVIL ACTION 6:20-cv-00980-ADA
DEVELOPMENT,	§	CIVIL ACTION 6:20-cv-00981-ADA
<i>Plaintiff,</i>	§	CIVIL ACTION 6:20-cv-00982-ADA
	§	CIVIL ACTION 6:20-cv-00984-ADA
v.	§	CIVIL ACTION 6:20-cv-00985-ADA
	§	
CANON INC.,	§	
<i>Defendant.</i>	§	
	§	

JOINT MOTION FOR EXTENSION OF UPCOMING DEADLINES

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU”) and Defendant Canon Inc. (“Canon”) file this Joint Motion for Extension of Upcoming Deadlines and respectfully show the following:

On October 19, 2020, WSOU filed Complaints for Patent Infringement. *See* Case No. 6:20-cv-00980, Dkt. 1; Case No. 6:20-cv-00981, Dkt. 1; Case No. 6:20-cv-00982, Dkt. 1; Case No. 6:20-cv-00984, Dkt. 1; Case No. 6:20-cv-00985, Dkt. 1. On March 15, 2021, Canon filed Motions to Dismiss for Failure to State a Claim under Federal Rule of Civil Procedure 12(b)(6) (“Motion to Dismiss”) and Answers. *See* Case No. 6:20-cv-00980, Dkts. 16 & 17; Case No. 6:20-cv-00981, Dkts. 13 & 14; Case No. 6:20-cv-00982, Dkts. 13 & 14; Case No. 6:20-cv-00984, Dkts. 13 & 14; Case No. 6:20-cv-00985, Dkts. 13 & 14. WSOU’s deadlines to respond to the Motions to Dismiss is Monday, April 12, 2021. *See* Text Orders dated March 18, 2021.

WSOU’s deadline to file an amended pleading is currently Monday, April 5, 2021. Fed. R. Civ. P. 15(a)(1)(B). WSOU requests a one-week extension of its deadline to file amended pleadings so that its deadline will coincide with its April 12, 2021 deadline to respond to the Motions to Dismiss. Canon does not object to this request.

Absent leave of Court, Canon’s deadline to file third-party Complaints is Monday, March 29, 2021. Fed. R. Civ. P. 14(a). Canon requests a two-week extension of this deadline so that it can continue to evaluate whether it will be necessary to file any third-party Complaints in these cases. WSOU does not object to this request.

Based on the foregoing, WSOU respectfully requests the Court extend the deadline for it to file an amended pleading by an additional 7 days, up to and including April 12, 2021, and Canon respectfully requests that the Court extend the deadline for it to file a third-party Complaint by 14 days, up to and including April 12, 2021.

Dated: March 26, 2021

/s/ Jonathan K. Waldrop

Jonathan K. Waldrop (CA Bar No. 297903)
(Admitted in this District)
jwaldrop@kasowitz.com
Darcy L. Jones (CA Bar No. 309474)
(Admitted in this District)
djones@kasowitz.com
Marcus A. Barber (CA Bar No. 307361)
(Admitted in this District)
mbarber@kasowitz.com
John W. Downing (CA Bar No. 252850)
(Admitted in this District)
jdowning@kasowitz.com
Heather S. Kim (CA Bar No. 277686)
(Admitted in this District)
hkim@kasowitz.com
Jack Shaw (CA Bar No. 309382)
(Admitted in this District)
jshaw@kasowitz.com
KASOWITZ BENSON TORRES LLP
333 Twin Dolphin Drive, Suite 200
Redwood Shores, California 94065
Telephone: (650) 453-5170
Facsimile: (650) 453-5096
Mark D. Siegmund (TX Bar No. 24117055)
mark@waltfairpllc.com

LAW FIRM OF WALT FAIR, PLLC
1508 N. Valley Mills Drive
Waco, TX 76710
Telephone: (254) 772-6400
Facsimile: (254) 772-6432

Attorneys for Plaintiff

WSOU INVESTMENTS, LLC d/b/a
BRAZOS LICENSING AND
DEVELOPMENT

Respectfully Submitted,

/s/ John M. Jackson

John M. Jackson (Texas Bar No. 24002340)
jjackson@jw.com
JACKSON WALKER, LLP
2323 Ross Avenue, Suite 600
Dallas, TX 75201
Tel: (214) 953-6000
Fax: (214) 953-5822

Richard F. Martinelli (*pro hac vice pending*)
rmartinelli@orrick.com

Joseph A. Calvaruso (*pro hac vice pending*)
jcalvaruso@orrick.com

ORRICK, HERRINGTON & SUTCLIFFE LLP
51 West 52nd Street
New York, NY 10019-6142
Tel: (212) 506-5000
Fax: (212) 506-5151

Attorneys for Defendant
Canon Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of March, 2021, the foregoing document was filed electronically with the Clerk of the Court via the Court's CM/ECF system which will send notification of such filing and constitute service upon all counsel of record who have registered as Filing Users. Any other known counsel of record will be served with a copy of the foregoing document via email.

/s/ John M. Jackson _____

John M. Jackson